

Transcript of the Testimony of:  
**Dana Shannon**

**Date:** September 15, 2023

**Case:** Felishatay Alvarado v. City of Philadelphia, et al.

Diamond Court Reporting  
Phone: 856-589-1107  
Fax: 856-589-4741  
Email: dcr.diamond@comcast.net

|   |  |         |      |              |  |                         |       |                                   |        |     |             |      |           |                   |   |
|---|--|---------|------|--------------|--|-------------------------|-------|-----------------------------------|--------|-----|-------------|------|-----------|-------------------|---|
| <div>Page 1</div> <div>IN THE COURT OF COMMON PLEAS<br/>FOR PHILADELPHIA COUNTY, PENNSYLVANIA<br/>---<br/>FELISHATAY ALVARADO, : JUNE TERM, 2022<br/>:<br/>Plaintiff, : NO. 01633<br/>:<br/>vs. :<br/>:<br/>CITY OF PHILADELPHIA, :<br/>et al., :<br/>:<br/>Defendants. :<br/>---<br/>September 15, 2023<br/>---<br/>Oral deposition of DANA SHANNON,<br/>taken pursuant to Notice at VICTIMS'<br/>RECOVERY LAW CENTER, 121 South Broad Street,<br/>18th Floor, Philadelphia, PA 19107,<br/>beginning at 10:00 a.m., before Candace<br/>Weindel, a Professional Reporter and a<br/>Notary Public in and for the Commonwealth of<br/>Pennsylvania.<br/>---<br/><br/>DIAMOND COURT REPORTING<br/>406 Redbud Lane<br/>Mantua, New Jersey 08051<br/>(856) 589-1107</div>  | <div>Page 3</div> <div>INDEX<br/><table><tr><td>WITNESS</td><td>PAGE</td></tr><tr><td>DANA SHANNON</td><td></td></tr><tr><td>Examination By Mr. West</td><td>4, 37</td></tr><tr><td>Examination By Mr. Santiago-Pagan</td><td>32, 39</td></tr></table><br/>EXHIBITS<br/><table><tr><td>NO.</td><td>DESCRIPTION</td><td>PAGE</td></tr><tr><td>Shannon-1</td><td>Client File Notes</td><td>4</td></tr></table></div>   | WITNESS | PAGE | DANA SHANNON |  | Examination By Mr. West | 4, 37 | Examination By Mr. Santiago-Pagan | 32, 39 | NO. | DESCRIPTION | PAGE | Shannon-1 | Client File Notes | 4 |
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| <div>Page 2</div> <div>1 APPEARANCES:<br/>2<br/>3 VICTIMS' RECOVERY LAW CENTER<br/>4 BY: KEITH WEST, ESQUIRE<br/>5 121 South Broad Street<br/>6 18th Floor<br/>7 Philadelphia, PA 19107<br/>8 (215) 546-1433<br/>9 Keith@victimrecoverylaw.com<br/>10 Representing the Plaintiff<br/>11<br/>12<br/>13<br/>14<br/>15 FIRST JUDICIAL DISTRICT OF PENNSYLVANIA<br/>16 BY: ERIC J. ASSINI, ESQUIRE<br/>17 Room 369 City Hall<br/>18 Philadelphia, PA 19107<br/>19 (215) 686-3745<br/>20 Eric.assini@courts.phila.gov<br/>21 Representing the Witness<br/>22<br/>23<br/>24<br/>25<br/>26<br/>27<br/>28<br/>29<br/>30<br/>31<br/>32<br/>33<br/>34<br/>35<br/>36<br/>37<br/>38<br/>39<br/>40<br/>41<br/>42<br/>43<br/>44<br/>45<br/>46<br/>47<br/>48<br/>49<br/>50<br/>51<br/>52<br/>53<br/>54<br/>55<br/>56<br/>57<br/>58<br/>59<br/>60<br/>61<br/>62<br/>63<br/>64<br/>65<br/>66<br/>67<br/>68<br/>69<br/>70<br/>71<br/>72<br/>73<br/>74<br/>75<br/>76<br/>77<br/>78<br/>79<br/>80<br/>81<br/>82<br/>83<br/>84<br/>85<br/>86<br/>87<br/>88<br/>89<br/>90<br/>91<br/>92<br/>93<br/>94<br/>95<br/>96<br/>97<br/>98<br/>99<br/>100<br/>101<br/>102<br/>103<br/>104<br/>105<br/>106<br/>107<br/>108<br/>109<br/>110<br/>111<br/>112<br/>113<br/>114<br/>115<br/>116<br/>117<br/>118<br/>119<br/>120<br/>121<br/>122<br/>123<br/>124<br/>125<br/>126<br/>127<br/>128<br/>129<br/>130<br/>131<br/>132<br/>133<br/>134<br/>135<br/>136<br/>137<br/>138<br/>139<br/>140<br/>141<br/>142<br/>143<br/>144<br/>145<br/>146<br/>147<br/>148<br/>149<br/>150<br/>151<br/>152<br/>153<br/>154<br/>155<br/>156<br/>157<br/>158<br/>159<br/>160<br/>161<br/>162<br/>163<br/>164<br/>165<br/>166<br/>167<br/>168<br/>169<br/>170<br/>171<br/>172<br/>173<br/>174<br/>175<br/>176<br/>177<br/>178<br/>179<br/>180<br/>181<br/>182<br/>183<br/>184<br/>185<br/>186<br/>187<br/>188<br/>189<br/>190<br/>191<br/>192<br/>193<br/>194<br/>195<br/>196<br/>197<br/>198<br/>199<br/>200<br/>201<br/>202<br/>203<br/>204<br/>205<br/>206<br/>207<br/>208<br/>209<br/>210<br/>211<br/>212<br/>213<br/>214<br/>215<br/>216<br/>217<br/>218<br/>219<br/>220<br/>221<br/>222<br/>223<br/>224<br/>225<br/>226<br/>227<br/>228<br/>229<br/>230<br/>231<br/>232<br/>233<br/>234<br/>235<br/>236<br/>237<br/>238<br/>239<br/>240<br/>241<br/>242<br/>243<br/>244<br/>245<br/>246<br/>247<br/>248<br/>249<br/>250<br/>251<br/>252<br/>253<br/>254<br/>255<br/>256<br/>257<br/>258<br/>259<br/>260<br/>261<br/>262<br/>263<br/>264<br/>265<br/>266<br/>267<br/>268<br/>269<br/>270<br/>271<br/>272<br/>273<br/>274<br/>275<br/>276<br/>277<br/>278<br/>279<br/>280<br/>281<br/>282<br/>283<br/>284<br/>285<br/>286<br/>287<br/>288<br/>289<br/>290<br/>291<br/>292<br/>293<br/>294<br/>295<br/>296<br/>297<br/>298<br/>299<br/>300<br/>301<br/>302<br/>303<br/>304<br/>305<br/>306<br/>307<br/>308<br/>309<br/>310<br/>311<br/>312<br/>313<br/>314<br/>315<br/>316<br/>317<br/>318<br/>319<br/>320<br/>321<br/>322<br/>323<br/>324<br/>325<br/>326<br/>327<br/>328<br/>329<br/>330<br/>331<br/>332<br/>333<br/>334<br/>335<br/>336<br/>337<br/>338<br/>339<br/>340<br/>341<br/>342<br/>343<br/>344<br/>345<br/>346<br/>347<br/>348<br/>349<br/>350<br/>351<br/>352<br/>353<br/>354<br/>355<br/>356<br/>357<br/>358<br/>359<br/>360<br/>361<br/>362<br/>363<br/>364<br/>365<br/>366<br/>367<br/>368<br/>369<br/>370<br/>371<br/>372<br/>373<br/>374<br/>375<br/>376<br/>377<br/>378<br/>379<br/>380<br/>381<br/>382<br/>383<br/>384<br/>385<br/>386<br/>387<br/>388<br/>389<br/>390<br/>391<br/>392<br/>393<br/>394<br/>395<br/>396<br/>397<br/>398<br/>399<br/>400<br/>401<br/>402<br/>403<br/>404<br/>405<br/>406<br/>407<br/>408<br/>409<br/>410<br/>411<br/>412<br/>413<br/>414<br/>415<br/>416<br/>417<br/>418<br/>419<br/>420<br/>421<br/>422<br/>423<br/>424<br/>425<br/>426<br/>427<br/>428<br/>429<br/>430<br/>431<br/>432<br/>433<br/>434<br/>435<br/>436<br/>437<br/>438<br/>439<br/>440<br/>441<br/>442<br/>443<br/>444<br/>445<br/>446<br/>447<br/>448<br/>449<br/>450<br/>451<br/>452<br/>453<br/>454<br/>455<br/>456<br/>457<br/>458<br/>459<br/>460<br/>461<br/>462<br/>463<br/>464<br/>465<br/>466<br/>467<br/>468<br/>469<br/>470<br/>471<br/>472<br/>473<br/>474<br/>475<br/>476<br/>477<br/>478<br/>479<br/>480<br/>481<br/>482<br/>483<br/>484<br/>485<br/>486<br/>487<br/>488<br/>489<br/>490<br/>491<br/>492<br/>493<br/>494<br/>495<br/>496<br/>497<br/>498<br/>499<br/>500<br/>501<br/>502<br/>503<br/>504<br/>505<br/>506<br/>507<br/>508<br/>509<br/>510<br/>511<br/>512<br/>513<br/>514<br/>515<br/>516<br/>517<br/>518<br/>519<br/>520<br/>521<br/>522<br/>523<br/>524<br/>525<br/>526<br/>527<br/>528<br/>529<br/>530<br/>531<br/>532<br/>533<br/>534<br/>535<br/>536<br/>537<br/>538<br/>539<br/>540<br/>541<br/>542<br/>543<br/>544<br/>545<br/>546<br/>547<br/>548<br/>549<br/>550<br/>551<br/>552<br/>553<br/>554<br/>555<br/>556<br/>557<br/>558<br/>559<br/>560<br/>561<br/>562<br/>563<br/>564<br/>565<br/>566<br/>567<br/>568<br/>569<br/>570<br/>571<br/>572<br/>573<br/>574<br/>575<br/>576<br/>577<br/>578<br/>579<br/>580<br/>581<br/>582<br/>583<br/>584<br/>585<br/>586<br/>587<br/>588<br/>589<br/>590<br/>591<br/>592<br/>593<br/>594<br/>595<br/>596<br/>597<br/>598<br/>599<br/>600<br/>601<br/>602<br/>603<br/>604<br/>605<br/>606<br/>607<br/>608<br/>609<br/>610<br/>611<br/>612<br/>613<br/>614<br/>615<br/>616<br/>617<br/>618<br/>619<br/>620<br/>621<br/>622<br/>623<br/>624<br/>625<br/>626<br/>627<br/>628<br/>629<br/>630<br/>631<br/>632<br/>633<br/>634<br/>635<br/>636<br/>637<br/>638<br/>639<br/>640<br/>641<br/>642<br/>643<br/>644<br/>645<br/>646<br/>647<br/>648<br/>649<br/>650<br/>651<br/>652<br/>653<br/>654<br/>65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| <div>Page 4</div> <div>1 (It is agreed by and between<br/>2 counsel for the respective parties that<br/>3 sealing, certification and filing are<br/>4 waived; and that all objections, except<br/>5 as to the form of the question, are<br/>6 reserved until the time of trial.)<br/>7 ---<br/>8 DANA SHANNON, after having been<br/>9 first duly sworn, was examined and<br/>10 testified as follows:<br/>11 ---<br/>12 EXAMINATION<br/>13 ---<br/>14 BY MR. WEST:<br/>15 Q. All right, Ms. Shannon. My name is<br/>16 Keith West. I'm one of the attorneys for the<br/>17 plaintiff in this case, Ms. Alvarado. I'm going<br/>18 to mark as Shannon-1 -- this is a pile of<br/>19 documents that you brought with you today as part<br/>20 of your appearance for today's subpoenaed<br/>21 deposition; correct?<br/>22 A. Yes.<br/>23 ---<br/>24 (Whereupon, the document was</div> |         |      |              |  |                         |       |                                   |        |     |             |      |           |                   |   |

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| <p style="text-align: right;">Page 5</p> <p>1 marked, for identification purposes, as</p> <p>2 Exhibit Number Shannon-1.)</p> <p>3 - - -</p> <p>4 BY MR. WEST:</p> <p>5 Q. Okay. And let me just go through</p> <p>6 some quick kind of preemptory things.</p> <p>7 Have you ever been in a deposition</p> <p>8 before?</p> <p>9 A. Yes.</p> <p>10 Q. How many times have you been</p> <p>11 deposed?</p> <p>12 A. Once.</p> <p>13 Q. And can you tell me, just</p> <p>14 generally, what that case was about?</p> <p>15 A. A car accident.</p> <p>16 Q. Okay. So unrelated to your</p> <p>17 employment for the City of Philadelphia; correct?</p> <p>18 A. Yes.</p> <p>19 Q. And you are in fact an employee of</p> <p>20 the City of Philadelphia; right?</p> <p>21 A. Yes.</p> <p>22 MR. ASSINI: Well, just to clarify,</p> <p>23 she is an employee of the First Judicial</p> <p>24 District, which is not -- it's not the</p>   | <p style="text-align: right;">Page 7</p> <p>1 Q. Okay. But your prior deposition</p> <p>2 appearance was unrelated to that; right?</p> <p>3 A. Yes.</p> <p>4 Q. How long have you worked as a</p> <p>5 parole officer?</p> <p>6 A. Twenty-two years.</p> <p>7 MR. WEST: Off the record.</p> <p>8 - - -</p> <p>9 (Whereupon, a discussion took place</p> <p>10 off the stenographic record.)</p> <p>11 - - -</p> <p>12 MR. SANTIAGO-PAGAN: I just want to</p> <p>13 state for the record that she is a</p> <p>14 probation officer, not a parole officer.</p> <p>15 MR. ASSINI: Yes, probation.</p> <p>16 Right.</p> <p>17 MR. WEST: Okay.</p> <p>18 BY MR. WEST:</p> <p>19 Q. Can you just tell me quickly what</p> <p>20 is the difference between probation and parole as</p> <p>21 far as the Commonwealth of Pennsylvania goes?</p> <p>22 MR. ASSINI: If you know.</p> <p>23 THE WITNESS: I'm trying to figure</p> <p>24 out how to answer that because we do</p>   |
| <p style="text-align: right;">Page 6</p> <p>1 same as the City of Philadelphia;</p> <p>2 however, it is -- it is the judicial</p> <p>3 branch of the City of Philadelphia.</p> <p>4 Like her -- it's separate, but the same,</p> <p>5 you know --</p> <p>6 MR. WEST: Well, no. That's what I</p> <p>7 am trying to figure out because I</p> <p>8 actually don't know the answer to that.</p> <p>9 Like the police department is like an</p> <p>10 entity of the City. Is --</p> <p>11 MR. ASSINI: More independent than</p> <p>12 that --</p> <p>13 MR. WEST: That's what I'm trying</p> <p>14 --</p> <p>15 MR. ASSINI: -- because we're the</p> <p>16 judicial branch, so that's --</p> <p>17 MR. SANTIAGO-PAGAN: Right.</p> <p>18 MR. WEST: Okay. I honestly didn't</p> <p>19 know the answer to that.</p> <p>20 BY MR. WEST:</p> <p>21 Q. I'm sorry. So you are an employee</p> <p>22 of the First Judicial District of Pennsylvania;</p> <p>23 right?</p> <p>24 A. Yes.</p> | <p style="text-align: right;">Page 8</p> <p>1 supervise people that's on parole as</p> <p>2 well.</p> <p>3 So, I mean, parole is if a person</p> <p>4 that has been sentenced to a jail</p> <p>5 sentence and if the judge says like</p> <p>6 immediate parole, then they can serve</p> <p>7 their sentence out on the street.</p> <p>8 Probation is just if the judge sentences</p> <p>9 a person to a period of probation and we</p> <p>10 also supervise them on the street.</p> <p>11 BY MR. WEST:</p> <p>12 Q. Right. Probation is a probationary</p> <p>13 release from prison. If the person doesn't meet</p> <p>14 the terms, they go back to prison; correct?</p> <p>15 A. It depends on the judge and if it's</p> <p>16 like a technical violation or a direct violation.</p> <p>17 Q. Okay. And you, in your capacity,</p> <p>18 you would supervise people who are released both</p> <p>19 under probation and under parole; correct?</p> <p>20 A. Yes.</p> <p>21 Q. What is your actual job title?</p> <p>22 A. I'm an Armed Probation Officer II,</p> <p>23 so I carry a firearm.</p> <p>24 Q. And how long have you had that</p> |

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|--|---|
| <p style="text-align: right;">Page 9</p> <p>1 particular job title?</p> <p>2 A. I've been doing the job for almost</p> <p>3 14 years, but technically didn't get classified</p> <p>4 until last July.</p> <p>5 Q. The incident giving rise to this</p> <p>6 case occurred a little over two years ago. Do you</p> <p>7 know what your job title would have been back</p> <p>8 then?</p> <p>9 A. Still a probation and parole</p> <p>10 officer and I was still armed, but I wasn't</p> <p>11 classified as that.</p> <p>12 MR. ASSINI: Can I --</p> <p>13 MR. WEST: Yes, please.</p> <p>14 MR. ASSINI: So our probation</p> <p>15 officers are part of a union, and as</p> <p>16 part of the collective bargaining</p> <p>17 agreement that was most recent, part of</p> <p>18 that was creating a new classification</p> <p>19 for armed officers and giving them a</p> <p>20 different salary scale because it</p> <p>21 requires extra things to --</p> <p>22 MR. WEST: Training.</p> <p>23 MR. ASSINI: -- you know, be armed,</p> <p>24 training and certifications and renewal.</p> | <p style="text-align: right;">Page 11</p> <p>1 was coming into the office.</p> <p>2 Q. Okay. What was on</p> <p>3 probation for?</p> <p>4 MR. ASSINI: Objection to form.</p> <p>5 But you can answer if you</p> <p>6 understand.</p> <p>7 BY MR. WEST:</p> <p>8 Q. I should have given you a few more</p> <p>9 instructions. You are only being -- all of my</p> <p>10 questions are just intended to ask what you</p> <p>11 personally know, so I am not going to ask you to</p> <p>12 guess or speculate at any time. If you are not in</p> <p>13 possession of complete understanding, but you can</p> <p>14 give us an estimate or an approximation, we would</p> <p>15 ask for you to let us know that you are giving us</p> <p>16 an estimate.</p> <p>17 This isn't intended to be an</p> <p>18 unnecessarily uncomfortable -- it's hard to hear</p> <p>19 me with this, isn't it? This isn't intended to be</p> <p>20 an unnecessarily uncomfortable process, so if at</p> <p>21 any point you would like a break or anything, just</p> <p>22 let me know. If you have any trouble</p> <p>23 understanding any of the questions, please don't</p> <p>24 answer them. I'll be more than glad to speak</p> |
| <p style="text-align: right;">Page 10</p> <p>1 So it didn't exist until it was</p> <p>2 collectively bargained.</p> <p>3 BY MR. WEST:</p> <p>4 Q. Okay. So have you always been an</p> <p>5 armed officer?</p> <p>6 A. No.</p> <p>7 Q. When did you first become an armed</p> <p>8 officer?</p> <p>9 A. I want to say 2011-ish. I can't</p> <p>10 remember the exact date.</p> <p>11 Q. But long before this incident;</p> <p>12 right?</p> <p>13 A. Yes.</p> <p>14 Q. So do you remember supervising</p> <p>15 someone who was on probation by the name of</p> <p>16 ?</p> <p>17 A. Yes.</p> <p>18 Q. Can you just -- for brevity's sake,</p> <p>19 I'm going to try to ask you a very general</p> <p>20 question.</p> <p>21 Can you tell me everything you</p> <p>22 remember about your interactions with ?</p> <p>23 A. Just we had contact by phone. It</p> <p>24 was during the pandemic, so at that time no one</p>   | <p style="text-align: right;">Page 12</p> <p>1 louder, slower, faster, rephrase questions if at</p> <p>2 all possible, anything like that. Okay?</p> <p>3 A. Yes.</p> <p>4 Q. With that said, do you know why</p> <p>5 was on probation, if he was?</p> <p>6 A. I believe it was for firearm</p> <p>7 charges, but I didn't write it down, so I can't</p> <p>8 remember offhand.</p> <p>9 Q. And how long did you supervise him?</p> <p>10 A. His case was transferred to me --</p> <p>11 his case was transferred to me on 7/24/2020.</p> <p>12 Q. And before that date in July of</p> <p>13 2020, was already under some form of</p> <p>14 supervision?</p> <p>15 A. Yes.</p> <p>16 Q. And are you able to remember or</p> <p>17 just by reviewing your notes able to determine</p> <p>18 when first went under -- on</p> <p>19 supervision?</p> <p>20 MR. ASSINI: Objection to form.</p> <p>21 But you can answer if you</p> <p>22 understand the question.</p> <p>23 THE WITNESS: I believe it was</p> <p>24 April 9, 2019.</p>   |

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1 BY MR. WEST:

2 Q. So well before the COVID pandemic;

3 correct?

4 A. Yes.

5 Q. Okay. And who would have been his

6 probation supervisor back then?

7 MR. ASSINI: Objection to form.

8 You can answer.

9 MR. WEST: If you know.

10 THE WITNESS: His supervisor or

11 officer?

12 MR. ASSINI: So I objected to form,

13 but you can -- if you want to clarify

14 that or ask -- go ahead.

15 BY MR. WEST:

16 Q. And if I am misstating things --

17 I'm very fortunate that, either as a civilian or a

18 lawyer, I have had almost no interaction with this

19 system, so I'm going to be misstating terms.

20 So if officer is the right --

21 probation officer --

22 MR. ASSINI: Can we go off the

23 record?

24 MR. WEST: Yes.

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1 - - -

2 (Whereupon, a discussion took place

3 off the stenographic record.)

4 - - -

5 MR. WEST: Let me ask the question

6 more generally.

7 BY MR. WEST:

8 Q. Do you know the name and title of

9 the person who would have been supervising

10 back when his case initiated in 2019?

11 A. Michael Anderson.

12 Q. Okay.

13 A. And he was under monitored

14 supervision, which is house arrest.

15 Q. Okay. House arrest.

16 And that date was, again, what in

17 2019?

18 MR. ASSINI: I think you said

19 April.

20 THE WITNESS: It says April 26,

21 2019 that they received notification of

22 house arrest.

23 BY MR. WEST:

24 Q. What is Michael Anderson's job

Page 15

1 title? At least what would it have been at that

2 time?

3 A. A probation parole officer.

4 Q. So generally the same as yourself?

5 A. Yes.

6 Q. In your experience, especially in

7 the pre-COVID days back in 2019, if someone was

8 placed on house arrest, would the probation

9 officer normally inspect the home?

10 MR. ASSINI: Objection to form.

11 You can answer.

12 THE WITNESS: Yes. They actually

13 go out and, I guess, investigate the

14 house and see if the person is eligible

15 to be on house arrest and see if the

16 equipment can fit in the house and, I

17 guess, the range.

18 BY MR. WEST:

19 Q. Okay. And don't you guys normally

20 inspect the house as well to see who the person is

21 living with because there's usually restrictions

22 limiting who people placed on probation are

23 allowed to live with?

24 MR. ASSINI: Objection to form.

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1 You can answer.

2 THE WITNESS: Am I speaking for

3 house arrest or speaking for what I do

4 in my unit?

5 BY MR. WEST:

6 Q. I guess house arrest.

7 But to ask a different question

8 then, do you never handle people with house

9 arrest?

10 A. I usually get people once they

11 complete house arrest and transfer them to our

12 unit.

13 Q. Okay. But are you still familiar

14 with what the procedures for house arrest are?

15 A. Not a hundred percent.

16 Q. Okay. Is it your general

17 understanding that in order for someone to be

18 placed on house arrest, a probation officer needs

19 to go to the house in question and inspect it?

20 A. Yes.

21 Q. And are you able -- thank you for

22 bringing these records with you. I'm only getting

23 a chance to quickly scan them for the first time

24 now.

|  |   |
|--|---|
| <p style="text-align: right;">Page 17</p> <p>1 Are you able to look on these and</p> <p>2 actually find if it's recorded anywhere that</p> <p>3 someone actually did physically go to the house</p> <p>4 where was living?</p> <p>5 A. Give me a second.</p> <p>6 Q. While you are looking for that, can</p> <p>7 I quickly ask you another question? I can see on</p> <p>8 the notation for April 29, 2019 that an NCIC check</p> <p>9 was performed.</p> <p>10 Do you know what NCIC would stand</p> <p>11 for in this case?</p> <p>12 A. It's like a GNET search. You have</p> <p>13 access to a federal database that you can look up</p> <p>14 offenders' information as far as their criminal</p> <p>15 history.</p> <p>16 Q. Okay.</p> <p>17 A. Only thing that I could see in the</p> <p>18 notes was that --</p> <p>19 Q. Yes, actually --</p> <p>20 A. -- on 4/25/2019 that a field team</p> <p>21 went out.</p> <p>22 Q. Yes. So if we go to April -- I'm</p> <p>23 sorry. I'm asking this question a little bit</p> <p>24 inappropriately, but I'm trying not to take up</p>                           | <p style="text-align: right;">Page 19</p> <p>1 the home or do you think, from these records, it</p> <p>2 would have been someone else?</p> <p>3 MR. ASSINI: If you know.</p> <p>4 THE WITNESS: Basically -- her name</p> <p>5 is Jaclyn Matteo. I think she gets the</p> <p>6 order and then she connects everybody to</p> <p>7 process and send people out. I don't</p> <p>8 know if she physically goes out, but I</p> <p>9 know she is like the handler of the</p> <p>10 house arrest applications that come</p> <p>11 through or the orders. She verifies it</p> <p>12 and then sends the team out to verify</p> <p>13 the address. Then once they come back,</p> <p>14 they will assign it to the officer who</p> <p>15 is going to be supervising the house</p> <p>16 arrest.</p> <p>17 BY MR. WEST:</p> <p>18 Q. All right. If we wanted to ask the</p> <p>19 person most likely to have more information about</p> <p>20 how this inspection occurred back in April of</p> <p>21 2019, do you think Jaclyn Matteo would be probably</p> <p>22 our best bet as far as to ask more questions?</p> <p>23 MR. ASSINI: If you know.</p> <p>24 Objection to form.</p> |
| <p style="text-align: right;">Page 18</p> <p>1 extra of your time.</p> <p>2 It specifically says right on here</p> <p>3 April 26, 2019 and somebody went to the house, and</p> <p>4 the location is specifically specified as a second</p> <p>5 floor apartment with the rear entrance off</p> <p>6 Margaret Street; right?</p> <p>7 A. Yes. But it stated that they went</p> <p>8 out on 4/25/2019.</p> <p>9 Q. Right. So these records indicate</p> <p>10 that somebody went out there and they knew at that</p> <p>11 time that the entrance to the property was through</p> <p>12 the rear door; correct?</p> <p>13 MR. ASSINI: Objection to form.</p> <p>14 MR. WEST: Well, actually, strike</p> <p>15 the question. It's a little bit of an</p> <p>16 inappropriate question.</p> <p>17 BY MR. WEST:</p> <p>18 Q. And you didn't write these records;</p> <p>19 right?</p> <p>20 A. Yes.</p> <p>21 Q. So looking at the notation on 4/26,</p> <p>22 it looks like the author's name is MatteoJ.</p> <p>23 Do you think that's the person who</p> <p>24 would have done the actual physical inspection of</p> | <p style="text-align: right;">Page 20</p> <p>1 THE WITNESS: I would say yes. And</p> <p>2 she probably could tell you who the</p> <p>3 officer's name and stuff were when they</p> <p>4 went out at that time.</p> <p>5 BY MR. WEST:</p> <p>6 Q. Okay. And is she still, as far as</p> <p>7 you are aware, currently employed with the First</p> <p>8 Judicial District?</p> <p>9 A. Yes.</p> <p>10 Q. Did you ever personally go to the</p> <p>11 home in which was allegedly staying?</p> <p>12 A. No.</p> <p>13 Q. Did you ever speak with anyone from</p> <p>14 the Philadelphia Police Department about executing</p> <p>15 a warrant at 's home?</p> <p>16 A. I spoke with a homicide detective.</p> <p>17 Q. Is that Detective Graf?</p> <p>18 A. Yes.</p> <p>19 MR. WEST: And Graf is spelled</p> <p>20 G-R-A-F.</p> <p>21 BY MR. WEST:</p> <p>22 Q. Did you speak with anyone else from</p> <p>23 the Philadelphia Police Department regarding this</p> <p>24 or only Detective Graf?</p>  |

|  |   |
|--|---|
| <p style="text-align: right;">Page 21</p> <p>1 A. Only Detective Graf.</p> <p>2 Q. Can you -- today, can you remember</p> <p>3 that conversation with Detective Graf?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. So please tell me everything</p> <p>6 you can remember about that conversation.</p> <p>7 A. Do you want me to read the note or</p> <p>8 just like summarize?</p> <p>9 Q. Well, that's what I am trying to</p> <p>10 distinguish. I am trying to distinguish between</p> <p>11 if you are just reading a note that, you know, is</p> <p>12 something that you know is written down or</p> <p>13 actually what you can remember independent from</p> <p>14 the notes.</p> <p>15 So right now I'm asking you -- if</p> <p>16 you wouldn't mind even kind of just setting the</p> <p>17 paper aside for a moment and just let me know what</p> <p>18 you can remember from your independent</p> <p>19 recollection, if anything.</p> <p>20 A. I just remember him calling me and</p> <p>21 stating how dangerous Mr. was and that he was</p> <p>22 wanted for murder and they were looking at him</p> <p>23 because he's been kind of terrorizing the</p> <p>24 neighborhood or the surrounding neighborhood that</p>   | <p style="text-align: right;">Page 23</p> <p>1 floor rear apartment. With that foundation, did</p> <p>2 Detective Graf ask you any questions about how to</p> <p>3 physically get access to that particular apartment</p> <p>4 number?</p> <p>5 MR. SANTIAGO-PAGAN: Objection to</p> <p>6 form.</p> <p>7 MR. ASSINI: You can answer to the</p> <p>8 extent you can.</p> <p>9 THE WITNESS: No.</p> <p>10 BY MR. WEST:</p> <p>11 Q. Did detective Graf ask you if you</p> <p>12 had access to any records that would have provided</p> <p>13 any sort of guidance as to how to physically</p> <p>14 access the apartment in which was</p> <p>15 believed to occupy?</p> <p>16 MR. ASSINI: Objection to form.</p> <p>17 But you can answer.</p> <p>18 THE WITNESS: No.</p> <p>19 BY MR. WEST:</p> <p>20 Q. Did Detective Graf ask to see these</p> <p>21 records that you have provided to us today?</p> <p>22 A. No.</p> <p>23 Q. If Detective Graf had asked to see</p> <p>24 these records, would you have provided him a copy?</p> |
| <p style="text-align: right;">Page 22</p> <p>1 he lived in. And then, at the time, they said</p> <p>2 they were going to execute a warrant at the house</p> <p>3 and they asked me have I been out.</p> <p>4 And I said, no, because of the</p> <p>5 pandemic we are not allowed to do any home visits.</p> <p>6 So then he said, can you verify or</p> <p>7 just tell me if the address I have is correct or</p> <p>8 do you have any alternative addresses?</p> <p>9 So at that time, I asked my</p> <p>10 supervisor -- because more recently we are not</p> <p>11 allowed to speak to certain people about releasing</p> <p>12 information. So my supervisor said it was okay to</p> <p>13 talk with him, and the address that he said was</p> <p>14 the same address that we had, that was in our</p> <p>15 notes. So I told him that was the same address,</p> <p>16 but I haven't personally been out to verify</p> <p>17 through a field visit like we would normally do.</p> <p>18 So they said they would just let me know if they</p> <p>19 pick him up.</p> <p>20 Q. Did Detective Graf -- strike the</p> <p>21 question.</p> <p>22 Just to lay a foundation, I can</p> <p>23 represent to you that the warrant in this case</p> <p>24 does specify that was on the second</p> | <p style="text-align: right;">Page 24</p> <p>1 A. I would have had --</p> <p>2 MR. SANTIAGO-PAGAN: Object to</p> <p>3 form.</p> <p>4 MR. ASSINI: Go ahead. You can</p> <p>5 answer.</p> <p>6 THE WITNESS: I would have had to</p> <p>7 get permission from our department and</p> <p>8 then if they said yes, then I could give</p> <p>9 it to him, but if not, then no.</p> <p>10 BY MR. WEST:</p> <p>11 Q. Can you think of any reason why the</p> <p>12 First Judicial District would be unwilling to</p> <p>13 cooperate on an issue like this with the</p> <p>14 Philadelphia Police Department?</p> <p>15 MR. ASSINI: Objection to form.</p> <p>16 MR. WEST: In your personal</p> <p>17 experience.</p> <p>18 THE WITNESS: We're just restricted</p> <p>19 on a lot of stuff, so right now, it's</p> <p>20 just you have to ask permission and if</p> <p>21 they say yes, you go with it, if they</p> <p>22 say no, then you don't.</p> <p>23 BY MR. WEST:</p> <p>24 Q. Do you have any personal knowledge</p>                |

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1 or understanding of why information would be  
 2 restricted as to what's provided to the  
 3 Philadelphia Police Department out trying to catch  
 4 a murder suspect?  
 5 MR. ASSINI: You can answer to the  
 6 extent you know. I mean --  
 7 THE WITNESS: No. We just follow  
 8 orders. That's all I can say.  
 9 BY MR. WEST:  
 10 Q. But in any case, if Detective Graf  
 11 had asked the question as to if an inspection had  
 12 been made of the address where was  
 13 believed to reside, you could have looked at your  
 14 records and answered the question in the  
 15 affirmative; correct?  
 16 MR. ASSINI: Objection to form.  
 17 MR. SANTIAGO-PAGAN: Objection to  
 18 form.  
 19 THE WITNESS: Can you repeat the  
 20 question?  
 21 BY MR. WEST:  
 22 Q. Yes. If Detective Graf had asked  
 23 the question whether your records indicated that  
 24 an inspection had been made of the home where

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1 was believed to reside, you could have  
 2 answered that in the affirmative; correct?  
 3 MR. ASSINI: Same objection to the  
 4 form.  
 5 But go ahead. You can answer.  
 6 THE WITNESS: I could have just  
 7 told him it was confirmed while he was  
 8 on house arrest, but I couldn't tell him  
 9 or confirm it at that time.  
 10 BY MR. WEST:  
 11 Q. Right. And you could have told him  
 12 what's indicated in these records, that the  
 13 entrance to the property was through the rear;  
 14 correct?  
 15 MR. ASSINI: Objection to form.  
 16 MR. SANTIAGO-PAGAN: Objection to  
 17 the form.  
 18 THE WITNESS: I guess, yes.  
 19 BY MR. WEST:  
 20 Q. And also, you know, our deposition  
 21 here has only been a few minutes. In the same  
 22 amount of time or less, you also could have told  
 23 him that if he wanted more information, he could  
 24 reach out to Jaclyn Matteo; correct?

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1 MR. ASSINI: Objection to the form.  
 2 THE WITNESS: I guess, yes.  
 3 BY MR. WEST:  
 4 Q. And I apologize. I'm going to ask  
 5 the question differently just because that  
 6 probably is objectionable.  
 7 If Detective Graf had asked you if  
 8 there was anyone in your office who had more  
 9 information about the home inspection, you could  
 10 have encouraged Detective Graf to get in touch  
 11 with Jaclyn Matteo; correct?  
 12 MR. SANTIAGO-PAGAN: Objection to  
 13 the form.  
 14 MR. ASSINI: Objection to the form.  
 15 But go ahead.  
 16 THE WITNESS: Yes or, I guess, his  
 17 officer at the time, supervisor, Michael  
 18 Anderson.  
 19 BY MR. WEST:  
 20 Q. Okay. And the only reason that you  
 21 didn't provide this information to Detective Graf  
 22 is because he didn't ask the question; correct?  
 23 MR. SANTIAGO-PAGAN: Objection to  
 24 form.

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1 THE WITNESS: I guess. I don't  
 2 remember.  
 3 BY MR. WEST:  
 4 Q. Is there any other reason why you  
 5 wouldn't -- strike the question.  
 6 Did you want to cooperate with  
 7 Detective Graf to give him any information that  
 8 might help him to capture this murder suspect?  
 9 MR. SANTIAGO-PAGAN: Objection to  
 10 form.  
 11 THE WITNESS: Yes.  
 12 BY MR. WEST:  
 13 Q. And would you have provided  
 14 Detective Graf with any question that he -- with  
 15 any -- strike the question.  
 16 Would you have willingly provided  
 17 Detective Graf with any information available to  
 18 you that would have assisted in the Philadelphia  
 19 Police Department executing this warrant in a way  
 20 that was likely to lead to the capture of  
 21 without infringing on the constitutional  
 22 rights of others?  
 23 MR. SANTIAGO-PAGAN: Objection to  
 24 form.



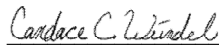
|  |   |
|--|---|
| <p style="text-align: right;">Page 29</p> <p>1 MR. ASSINI: Objection to the form.</p> <p>2 You can try to answer.</p> <p>3 THE WITNESS: Oh. Yes.</p> <p>4 BY MR. WEST:</p> <p>5 Q. And when Detective Graf called you,</p> <p>6 you were cooperative and willing to provide any</p> <p>7 information available to you?</p> <p>8 MR. ASSINI: Objection to form.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: Yeah, as long as it</p> <p>11 was in the rights that my supervisor was</p> <p>12 okay with it, yes.</p> <p>13 BY MR. WEST:</p> <p>14 Q. Okay. And probably the last</p> <p>15 question, all of the information that you have</p> <p>16 provided us today, this printout from your</p> <p>17 records, this would have been available to you</p> <p>18 back a couple of years ago as well; correct?</p> <p>19 MR. ASSINI: Objection to form.</p> <p>20 But go ahead.</p> <p>21 THE WITNESS: Yes, but sometimes</p> <p>22 house arrest notes aren't imported to</p> <p>23 us, so we might not have been able to</p> <p>24 see it. But usually if it's just a</p> | <p style="text-align: right;">Page 31</p> <p>1 THE WITNESS: Based on the notes, I</p> <p>2 could have. But if I didn't have access</p> <p>3 to the notes, then I would have to go to</p> <p>4 house arrest directly and ask for access</p> <p>5 to the notes.</p> <p>6 BY MR. WEST:</p> <p>7 Q. And is that something you would</p> <p>8 have been willing to do if Detective Graf had</p> <p>9 asked you to do it?</p> <p>10 A. If I was able to get permission to</p> <p>11 do so, yes.</p> <p>12 Q. Do you have any reason to believe</p> <p>13 your supervisor wouldn't have allowed you to do</p> <p>14 that?</p> <p>15 MR. SANTIAGO-PAGAN: Objection to</p> <p>16 the form.</p> <p>17 MR. ASSINI: Objection to the form.</p> <p>18 THE WITNESS: I guess it depends on</p> <p>19 what the director says to him. A lot of</p> <p>20 things we have to get permission to do,</p> <p>21 so it depends on that.</p> <p>22 BY MR. WEST:</p> <p>23 Q. Okay. And you also could have</p> <p>24 encouraged Detective Graf to speak with your</p> |
| <p style="text-align: right;">Page 30</p> <p>1 regular officer transferring paperwork,</p> <p>2 we would be able to see all of the</p> <p>3 notes.</p> <p>4 BY MR. WEST:</p> <p>5 Q. All right. And the records</p> <p>6 indicating the home inspection, that would have</p> <p>7 been available to you back at the time you spoke</p> <p>8 to Detective Graf; correct?</p> <p>9 MR. SANTIAGO-PAGAN: Objection to</p> <p>10 form.</p> <p>11 THE WITNESS: It was available, but</p> <p>12 not always -- it's not always</p> <p>13 accessible. Like usually house arrest</p> <p>14 notes are separate from the notes that</p> <p>15 we see.</p> <p>16 BY MR. WEST:</p> <p>17 Q. Is that something that you could --</p> <p>18 if Detective Graf had asked you to find if the</p> <p>19 home had ever been inspected, could you have</p> <p>20 provided him an accurate answer to that question</p> <p>21 even back at the time Detective Graf spoke with</p> <p>22 you?</p> <p>23 MR. ASSINI: Objection to form.</p> <p>24 But go ahead.</p>                                   | <p style="text-align: right;">Page 32</p> <p>1 supervisor directly; correct?</p> <p>2 MR. SANTIAGO-PAGAN: Objection to</p> <p>3 the form.</p> <p>4 MR. ASSINI: Objection to the form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. WEST:</p> <p>7 Q. But none of that happened because</p> <p>8 Detective Graf didn't ask the question; correct?</p> <p>9 MR. SANTIAGO-PAGAN: Objection to</p> <p>10 form.</p> <p>11 THE WITNESS: Right.</p> <p>12 MR. WEST: I have nothing further</p> <p>13 for you today. I hope you do have a</p> <p>14 wonderful Friday. I hope that they are</p> <p>15 going to let you have the whole day off.</p> <p>16 THE WITNESS: That would be nice.</p> <p>17 MR. ASSINI: That's not my call.</p> <p>18 MR. SANTIAGO-PAGAN: Do you have</p> <p>19 anything to follow up?</p> <p>20 MR. ASSINI: Well, no. Go ahead.</p> <p>21 - - -</p> <p>22 EXAMINATION</p> <p>23 - - -</p> <p>24 BY MR. SANTIAGO-PAGAN:</p>  |

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| <p style="text-align: right;">Page 33</p> <p>1 Q. Ms. Shannon, these documents that</p> <p>2 you provided today were not provided to Mr. Graf</p> <p>3 when you spoke to him related to the conversation</p> <p>4 that you had with him on, it looks like, June 2,</p> <p>5 2021, is that right, these documents themselves?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. You would have needed to get</p> <p>8 permission from a supervisor to give him any of</p> <p>9 the information contained in these records; right?</p> <p>10 A. Yes.</p> <p>11 Q. In fact, you did get permission</p> <p>12 even just to confirm the address that Mr. Graf</p> <p>13 provided to you; right?</p> <p>14 A. Yes.</p> <p>15 Q. And similarly to how you needed to</p> <p>16 get permission to just provide confirmation of the</p> <p>17 address, you would have needed to get permission</p> <p>18 to provide any other information in these</p> <p>19 documents; correct?</p> <p>20 MR. ASSINI: Objection to the form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. SANTIAGO-PAGAN:</p> <p>23 Q. And you don't know because you are</p> <p>24 unaware as of today what the parameters are for</p> | <p style="text-align: right;">Page 35</p> <p>1 MR. SANTIAGO-PAGAN: Page --</p> <p>2 THE WITNESS: 2 of 21.</p> <p>3 MR. SANTIAGO-PAGAN: -- 2 of 21.</p> <p>4 Thank you.</p> <p>5 BY MR. SANTIAGO-PAGAN:</p> <p>6 Q. Where it says he wanted to know if</p> <p>7 we verified his address or had any alternative</p> <p>8 addresses to one they had on file which is the</p> <p>9 address we had, do you agree that that's what it</p> <p>10 said?</p> <p>11 A. Yes.</p> <p>12 Q. And that's what you were referring</p> <p>13 to with you had to get confirmation from your</p> <p>14 supervisor to confirm that -- verify that that was</p> <p>15 the address; correct?</p> <p>16 A. Yes.</p> <p>17 Q. And then later on it says PO told</p> <p>18 him we only had contact with PP by phone.</p> <p>19 Do you agree that that's what it</p> <p>20 said?</p> <p>21 A. Yes.</p> <p>22 Q. And that's what you were referring</p> <p>23 to earlier when you said you didn't actually go</p> <p>24 out to the home, you only were supervising him by</p> |
| <p style="text-align: right;">Page 34</p> <p>1 giving information and not --</p> <p>2 MR. ASSINI: Objection to form.</p> <p>3 Sorry.</p> <p>4 BY MR. SANTIAGO-PAGAN:</p> <p>5 Q. -- what -- whether your supervisor</p> <p>6 would have allowed you to provide this information</p> <p>7 or not; correct?</p> <p>8 A. Yes.</p> <p>9 Q. And then I just want to go to the</p> <p>10 June 2, 2021 note itself.</p> <p>11 MR. SANTIAGO-PAGAN: Is that</p> <p>12 Shannon-1?</p> <p>13 MR. WEST: Yes.</p> <p>14 BY MR. SANTIAGO-PAGAN:</p> <p>15 Q. On the exhibit marked Shannon-1,</p> <p>16 where it says 12:30, phone, Homicide Detective</p> <p>17 Fran Graf -- do you agree that it says that there?</p> <p>18 A. Yes.</p> <p>19 Q. And can you read through that note</p> <p>20 where it says -- maybe in the middle of the</p> <p>21 paragraph it says he wanted to know if we verified</p> <p>22 -- do you see where I am reading?</p> <p>23 A. Yes.</p> <p>24 MR. WEST: What's the page number?</p>  | <p style="text-align: right;">Page 36</p> <p>1 phone; correct?</p> <p>2 A. Yes.</p> <p>3 Q. And where it says we could not</p> <p>4 confirm his address by a field visit, do you agree</p> <p>5 that that's what it says?</p> <p>6 A. Yes.</p> <p>7 Q. And that's because you hadn't gone</p> <p>8 out and confirmed it via field visit?</p> <p>9 A. Yes.</p> <p>10 Q. Were you asked whether you could</p> <p>11 have confirmed the address of Mr. by</p> <p>12 field visit?</p> <p>13 MR. ASSINI: Objection to the form.</p> <p>14 You can answer.</p> <p>15 THE WITNESS: He asked me have you</p> <p>16 been out to the house and I said no.</p> <p>17 BY MR. SANTIAGO-PAGAN:</p> <p>18 Q. When you write a note like we could</p> <p>19 not confirm his address by field visit, in your</p> <p>20 experience, in your personal experience, is that</p> <p>21 because you are being asked whether -- strike</p> <p>22 that.</p> <p>23 MR. SANTIAGO-PAGAN: I have nothing</p> <p>24 further.</p>   |

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| <p style="text-align: right;">Page 37</p> <p>1 MR. WEST: Just real quick</p> <p>2 follow-up.</p> <p>3 - - -</p> <p>4 EXAMINATION</p> <p>5 - - -</p> <p>6 BY MR. WEST:</p> <p>7 Q. Did Detective Graf request any</p> <p>8 information from you that you told him, for any</p> <p>9 reason, you couldn't give him?</p> <p>10 MR. SANTIAGO-PAGAN: Objection to</p> <p>11 form.</p> <p>12 MR. WEST: I can rephrase the</p> <p>13 question.</p> <p>14 BY MR. WEST:</p> <p>15 Q. Is there any question that</p> <p>16 Detective Graf asked you that you replied by</p> <p>17 telling him that you couldn't give him the</p> <p>18 information for any reason?</p> <p>19 MR. SANTIAGO-PAGAN: Objection to</p> <p>20 form.</p> <p>21 THE WITNESS: No.</p> <p>22 BY MR. WEST:</p> <p>23 Q. Okay. So any question that</p> <p>24 Detective Graf actually asked you, you gave him an</p> | <p style="text-align: right;">Page 39</p> <p>1 Q. ISTPD. So the first entry on here,</p> <p>2 it says this Sequence 3 automated appointment has</p> <p>3 been scheduled by ISTPD.</p> <p>4 Do you know what ISTPD stands for</p> <p>5 on Page 1?</p> <p>6 A. Oh. That's -- so back when it was</p> <p>7 a pandemic, we only had contact with people by</p> <p>8 phone. And then after a certain amount of time,</p> <p>9 they automatically scheduled people to come in on</p> <p>10 certain dates, and so they were allowed -- the</p> <p>11 people were allowed or the probationers were</p> <p>12 allowed to come back into the building on that</p> <p>13 date and time.</p> <p>14 So the ISTPD is the author of the</p> <p>15 note. So they imported the notes into our system</p> <p>16 to notify us when we can tell people to start</p> <p>17 reporting in person.</p> <p>18 Q. Okay.</p> <p>19 MR. SANTIAGO-PAGAN: You good?</p> <p>20 MR. WEST: Yes.</p> <p>21 - - -</p> <p>22 EXAMINATION</p> <p>23 - - -</p> <p>24 BY MR. SANTIAGO-PAGAN:</p>   |
| <p style="text-align: right;">Page 38</p> <p>1 accurate answer to the best of your ability;</p> <p>2 correct?</p> <p>3 MR. SANTIAGO-PAGAN: Objection to</p> <p>4 form.</p> <p>5 MR. ASSINI: Objection to the form.</p> <p>6 Go ahead.</p> <p>7 THE WITNESS: Yes.</p> <p>8 MR. WEST: Okay. No further</p> <p>9 questions.</p> <p>10 MR. ASSINI: I have nothing.</p> <p>11 MR. SANTIAGO-PAGAN: Just give me</p> <p>12 one second.</p> <p>13 MR. WEST: While you look that up,</p> <p>14 I have one last.</p> <p>15 BY MR. WEST:</p> <p>16 Q. This says ISTPD, what's that stand</p> <p>17 for?</p> <p>18 MR. ASSINI: Do you know where we</p> <p>19 are looking?</p> <p>20 MR. WEST: Yes, just the first</p> <p>21 line.</p> <p>22 THE WITNESS: Say that question</p> <p>23 again.</p> <p>24 BY MR. WEST:</p>  | <p style="text-align: right;">Page 40</p> <p>1 Q. So Ms. Shannon, you willingly gave</p> <p>2 information to Officer Graf when he called you;</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. But you did that after you got</p> <p>6 permission from your supervisor; correct?</p> <p>7 A. Yes.</p> <p>8 Q. And then where -- we are looking</p> <p>9 back at the same Page 2 of 21 where it says --</p> <p>10 right above the 12:30 p.m. note, there's a 1:00</p> <p>11 p.m. note. It says PO left a voicemail stating</p> <p>12 she is looking for PP to call her back at</p> <p>13 215-683-1097.</p> <p>14 Do you agree that it says that?</p> <p>15 A. Yes.</p> <p>16 Q. As you sit here today, do you</p> <p>17 recall why you were calling, what information you</p> <p>18 were trying to gather?</p> <p>19 A. I was just trying to get in contact</p> <p>20 with him to report. At the time, I haven't had a</p> <p>21 phone call from him, so I just reached out to him.</p> <p>22 Q. Was the conversation that you had</p> <p>23 with Homicide Detective Fran Graf, did that lead</p> <p>24 you to try to make a phone call?</p> |

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|    | Page 41   |
| 1  | A. Yes.   |
| 2  | Q. And was there anything that you can            |
| 3  | recall that you were trying to confirm through    |
| 4  | that phone call?                                  |
| 5  | A. Just to establish contact with him             |
| 6  | because we gave him certain dates and times to    |
| 7  | call and report in and just verify to his address |
| 8  | one more time just to be sure.                    |
| 9  | Q. Do you recall whether you were                 |
| 10 | verifying his address for any specific reason?    |
| 11 | A. Just like to verify it again.                  |
| 12 | Usually when they call we ask if their address,   |
| 13 | phone number is the same and if they're employed  |
| 14 | or not or if anything new happened by the time -- |
| 15 | from the last time we spoke with him.             |
| 16 | Q. Okay.  |
| 17 | MR. SANTIAGO-PAGAN: I have nothing                |
| 18 | further.  |
| 19 | - - -   |
| 20 | (Whereupon, a discussion took place               |
| 21 | off the stenographic record.)                     |
| 22 | - - -   |
| 23 | MR. SANTIAGO-PAGAN: I just want to                |
| 24 | move to designate the portions of this            |

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|    | Page 42                                  |
| 1  | deposition that refer to Mr.             |
| 2  | by his name to be designated as          |
| 3  | confidential pursuant to the             |
| 4  | confidentiality order with regard to the |
| 5  | suspect's name that's in place for this  |
| 6  | case.                                    |
| 7  | MR. WEST: No objection.                  |
| 8  | MR. ASSINI: That's fine.                 |
| 9  | MR. SANTIAGO-PAGAN: That's all.          |
| 10 | - - -                                    |
| 11 | (Whereupon, the deposition               |
| 12 | concluded at 10:39 a.m.)                 |
| 13 | - - -                                    |
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|    | Page 43  |
| 1  | CERTIFICATION  |
| 2  |  |
| 3  | I, CANDACE WEINDEL, hereby   |
| 4  | certify that the foregoing is a true and   |
| 5  | correct transcript transcribed from the  |
| 6  | stenographic notes taken by me on Friday,  |
| 7  | September 15, 2023.  |
| 8  |  |
| 9  |  |
| 10 |  |
| 11 |  |
| 12 |  |
| 13 | <br>Candace Weindel,<br>Court Reporter<br>Notary Public |
| 14 |  |
| 15 |  |
| 16 |  |
| 17 | (This certification does not apply   |
| 18 | to any reproduction of this transcript,  |
| 19 | unless under the direct supervision of   |
| 20 | the certifying reporter.)  |
| 21 |  |
| 22 |  |
| 23 |  |
| 24 |  |

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|    | Page 44                                      |
| 1  | INSTRUCTIONS TO WITNESS.                     |
| 2  |  |
| 3  | Please read your deposition over             |
| 4  | carefully and make any necessary             |
| 5  | corrections. You should state the reason in  |
| 6  | the appropriate space on the errata sheet    |
| 7  | for any corrections that are made.           |
| 8  | After doing so, please sign the              |
| 9  | errata sheet and date it.                    |
| 10 | You are signing same subject to the          |
| 11 | changes you have noted on the errata sheet,  |
| 12 | which will be attached to your deposition.   |
| 13 | It is imperative that you return the         |
| 14 | original errata sheet to the deposing        |
| 15 | attorney within thirty (30) days of receipt  |
| 16 | of the deposition transcript by you. If you  |
| 17 | fail to do so, the deposition transcript may |
| 18 | be deemed to be accurate and may be used in  |
| 19 | court.                                       |
| 20 |  |
| 21 |  |
| 22 |  |
| 23 |  |
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## E R R A T A

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PAGE LINE CHANGE

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Reason for Change: \_\_\_\_\_

## ACKNOWLEDGMENT OF DEPONENT

I, \_\_\_\_\_, do hereby  
 certify that I have read the foregoing pages  
 \_\_\_ to \_\_\_ and that the same is a correct  
 transcription of the answers given by me to  
 the questions therein propounded, except for  
 the corrections or changes in form or  
 substance, if any, noted in the attached  
 Errata Sheet.

DATE \_\_\_\_\_ SIGNATURE \_\_\_\_\_

Subscribed and sworn to before  
 me this

\_\_\_\_\_ day of \_\_\_\_\_, 2023.

My commission expires:

\_\_\_\_\_  
 Notary Public

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